

Application Guidelines for Brownfields Job Training Grants Frequently Asked Questions (FAQs)

<http://www.epa.gov/oswer/grants-funding.htm>

Q. What does the Brownfields Job Training Grant application process entail in Fiscal Year (FY) 2010?

A. The process for applying for a Brownfields Job Training Grant consists of submitting a single proposal as discussed in the FY10 Guidelines for Brownfields Job Training Grants (Guidelines) /Request for Proposals (RFP). The Guidelines can be found at <http://www.epa.gov/oswer/grants-funding.htm> or on <http://www.grants.gov>. EPA is asking eligible applicants to demonstrate that they meet threshold eligibility requirements, to respond to ranking criteria that will be used to rank proposals and to provide pertinent attachments described in Section IV of the Guidelines. The closing date and time for submission of proposals is December 1, 2009, 11:59 p.m. EST. See Section IV.B. of the Guidelines for submission details.

The process for applying for the assessment, revolving loan fund, and cleanup grants are discussed in separate guidelines from the job training program and are listed under a different CFDA number.

Q. How do I get help in understanding and responding to the FY 2010 Brownfields Job Training Grant guidelines?

A. Applicants should review information on the EPA's brownfields website <http://www.epa.gov/brownfields>. EPA regional brownfields staff may provide pre-application assistance to individual applicants regarding threshold eligibility requirements only. Contact information for each Regional Brownfields Job Training Coordinator is provided in Section VII of the Guidelines/RFP. Regional staff will not provide assistance to help applicants prepare their responses to ranking criteria. Agency personnel will not review drafted proposals.

Q. Who is eligible to apply for a brownfields job training grant?

*A. Applicants must be either eligible **governmental entities** as defined in CERCLA Section 104(k)(1) or eligible **nonprofit organizations** as defined in Public Law 106-107, the Federal Financial Assistance Management Improvement Act.*

Eligible governmental entities include a general purpose local unit of government; a land clearance authority or other quasi-governmental entity that operates under the supervision and control of, or as an agent of, a general purpose unit of government; a governmental entity created by a state legislature; a regional council or group of general purpose units of local government; a redevelopment agency that is chartered or otherwise sanctioned by a state; a state; an Indian Tribe (other than in Alaska), or an Alaskan Native Regional Corporation and an Alaska Native Village Corporation as those terms are defined in the Alaska Native Claims Settlement Act (43 U.S.C. 1601 and following); and the Metlakatla Indian Community. EPA

welcomes and encourages proposals from coalitions of such entities, but a single eligible entity must be identified as the legal recipient. Intertribal consortia, except consortia comprised of ineligible Alaskan tribes, are eligible to apply as well.

Eligible nonprofit organizations include any corporation, trust, association, cooperative, or other organization that is operated mainly for scientific, educational, service, charitable, or similar purpose in the public interest; is not organized primarily for profit; and uses net proceeds to maintain, improve, or expand the operation of the organization. Workforce Investment Boards that meet these criteria may be eligible nonprofit organizations. Public and nonprofit private educational institutions are eligible to apply. However, nonprofit organizations described in Section 501(c)(4) of the Internal Revenue Code that engage in lobbying activities as defined in Section 3 of the Lobbying Disclosure Act of 1995 are **not** eligible to apply.

For-profit or proprietary training organizations or trade schools are not eligible to apply. Nonprofit applicants must provide proof of their nonprofit 501(c)(3) status at the time the proposal is submitted.

Additionally, eligible applicants must identify and propose to serve a community that currently receives, or has received, financial assistance (federal, state, or tribal) for brownfields assessment, revolving loan fund, cleanup, site-specific response program work, and/or EPA-funded targeted brownfields assessments.

See Section III.A. of the Guidelines for additional information.

Q. How have the Brownfields Job Training Grant Guidelines changed since the FY 2009 competition?

A. For the Fiscal Year 2010 Brownfields Job Training Grant competition, please be aware that changes have been made to the proposal guidelines. The FY 2009 Brownfields Job Training Guidelines for the regular appropriation and the American Recovery and Reinvestment Act are no longer valid.

-EPA has made some changes in the formatting of the guidelines in an effort to make the Job Training Guidelines more streamlined and consistent with the Assessment, Revolving Loan Fund and Cleanup Grant Guidelines. **Please pay careful attention to Section IV of the Guidelines “Proposal Submission Information,” and Section III.B. Threshold Criteria.**

- The transmittal letter should be no more than two pages in length and is not included within the 18 page limit for the “narrative proposal.”

- Threshold criteria now consist of only 4 requirements: Applicant Eligibility, Limitation on FY09 (including ARRA recipients), Location of the Proposed Project, and Required Training.

See Section III.B. for additional information. Please note:

- A letter to your state environmental authority **is no longer required.***
- An SF424, Application for Federal Assistance, **is no longer required.***
- Proof that the proposed job training project does not duplicate other federally funded job training programs in your area **is no longer required.***

-Some of the ranking criteria have also changed in an effort to reduce redundancy and clarify criteria. There are now only 6 ranking criteria. Additionally, some of the point distributions among the sub-factors under each ranking criterion have been changed. See Section V.B. for additional information.

*-Nonprofit applicants must provide documentation of nonprofit status (evidence of incorporation as a nonprofit of federal tax exempt status) at the time of proposal submission and include it as an attachment. This documentation will **not** count towards the 20 page limitation for attachments.*

-Under EPA Order 5700.7, "Environmental Results Under EPA Assistance Agreements," please be aware that the EPA will pay careful attention to an applicant's strategy and responses to the ranking criteria associated with achieving the required outcomes and outputs listed in Section I of the Guidelines. Ultimately, an applicant's responses to the ranking criteria must support EPA's Strategic Plan and the Government Performance and Results Act (GPRA) architecture. Applicants are encouraged to provide quantitative anticipated results including the number of persons recruited, the number of persons completing training, the number of persons placed in full-time employment, and the number of persons retaining employment after one year.

-In FY10, applicants are also encouraged to include innovative technologies as part of their proposed training curriculum. In light of the "green jobs" dialogue currently taking place, these technologies and training could include a host of topics including installation of renewable energy technologies on brownfield sites, bioremediation, demolition debris and waste recycling, biosolids reuse, mine-scarred land remediation, etc. However, applicants should demonstrate how this training will assist graduates with obtaining employment before included in a curriculum. Please see the RFP section on eligible costs. EPA has elaborated upon what constitutes an eligible cost and has specifically identified additional training that applicants may want to incorporate into their curriculums.

Note: Please note that these are not the only changes which have occurred for FY 2010. Please review the Brownfields Job Training Guidelines at the website listed above prior to submitting a job training grant proposal.

*- In FY10, proposals may be submitted via email to bfcompetition@epa.gov. Proposals will **not** be accepted through grants.gov. Hard copy submission is still allowed.*

Q. How will my proposal be evaluated?

A. Evaluation panels comprised of EPA employees and representatives of other federal agencies will assess how well the proposals meet the ranking criteria outlined in Section V of the Brownfields Job Training Grant Guidelines. There are two different types of criteria- “threshold criteria” and “ranking criteria.” Threshold and ranking criteria are clearly indicated. If a response fails to meet any threshold criterion, listed in Section III.B., the proposal will be disqualified from further consideration and the applicant will be notified. However, EPA regional representatives may seek clarification from an applicant regarding its response to a threshold criterion. EPA will not seek clarification of responses to any ranking criteria.

The evaluation panel will determine which proposals have the potential to effectively use the limited funds EPA has available for awards. Scores on each ranking criterion will be totaled to determine the panel’s recommended proposal rankings. EPA senior management will determine the final ranking of proposals, taking into consideration the recommendations of the review panel. In making final selection recommendations, EPA’s Selection Official may consider the following factors if, and as, appropriate:

- Fair distribution of funds between urban and non-urban areas;*
- Fair geographic distribution of funds between EPA’s ten Regions;*
- Fair distribution of funds between new applicants and previous brownfields grant recipients;*
- Whether the applicant is a federally recognized Indian Tribe or United States Territory;*
- Applicants affected by natural disasters.*
- Designation as an EZ or Renewal Community.*
- Environmental Justice – a community that bears a disproportionate impact of environmental contamination.*

Q. What is the maximum amount of money that an applicant may be awarded?

A. Under the Guidelines/RFP, an eligible applicant may apply for up to \$200,000 per job training grant. However, EPA reserves the right to fund successful proposals at lower amounts depending upon the availability of EPA funds, applicant’s access to other funding sources, quality of the applicant’s proposal, and community need. The project period for the Brownfields Job Training Grants is up to two years. Actual funding is dependent upon the availability of funds through the federal budget process. Contact your Regional EPA Brownfields Job Training Coordinator for additional information. (A list of contacts can be found in the Brownfields Job Training Grant Guidelines in Section VII.)

In FY10, EPA anticipates awarding approximately 12–13 job training grants.

Q. What is a brownfield site?

A. For the purpose of EPA’s Brownfields Grant Program, a “brownfield(s)” is defined in Section 101(39) of the Comprehensive Environmental Response, Compensation, and Liability Act

(CERCLA) of 1980, as amended, as:

“(...) real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.”

The law further defines the term “brownfield site” to include a site that “(...) is contaminated by a controlled substance; is contaminated by petroleum or a petroleum product excluded from the definition of ‘hazardous substance’; or is mine-scarred land”.

Q. How does an applicant ensure that all uses of EPA funds are eligible?

A. Applicants must carefully review the proposal Guidelines to ensure that the activities included in their proposal are consistent. For example, stipends for trainees under this program are not an allowable cost under this grant program. (Please see Appendix 1 in the Job Training Guidelines “Prohibitions on Use of Funds” and Section I.B. on “Uses of Grant Funds” for additional information). Please note that due to the administrative cost prohibition contained in the Brownfields law, indirect costs are not eligible under brownfields grants. EPA also encourages applicants to carefully review the OMB Cost Principles applicable to their organization (e.g. OMB Circular A-122 for non profit organizations).

Q. How do I submit my proposal?

A. Proposals submitted in hard copy must be postmarked by the closing date and time (see Section IV.B. of the Job Training Guidelines for additional information). Proposals will also be accepted via email at bfcompetition@epa.gov.

Q. Why does EPA discourage binders and color printing?

A. Each proposal is photocopied and distributed to members of the National Review Panel. Graphics, binders, charts, color copies, etc., do not photocopy well and may distort information submitted for reproduction.

Q. If my organization is successful in obtaining EPA funding, can we charge the costs we incurred for a consultant to prepare our grant proposal?

A. No. Costs for preparing proposals are an unallowable administrative cost.

Q. Will EPA fund pre-award costs?

A. Yes, to the extent allowed by 40 CFR 30.25(f)(1) and EPA policies implementing 40 CFR 31.23 and OMB Circular A-87 (now 2 CFR Part 225) Appendix B, Item 31. Successful

applicants may incur pre-award costs up to 90 days before award without prior EPA approval provided:

- 1. The applicant includes the pre-award costs in its proposal;*
- 2. EPA agrees that the costs are eligible and allowable when the Agency approves the scope of work for the grant; and*
- 3. Any procurement contracts that are funded with pre-award costs comply with the competitive Procurement Standards at 40 CFR Part 30 or 40 CFR 31.36 as applicable.*

*Please note an applicant must obtain prior EPA approval to incur pre-award costs more than 90 days before award. Also, **applicants incur pre-award at their own risk and EPA is under no obligation to reimburse applicants for pre-award costs if the applicant does not receive an award or if the amount of the award is less than the applicant anticipates.***

Q. Can a non-profit organization or eligible governmental applicant submit a joint application in partnership with a for-profit organization?

A. No. EPA awards Brownfield Job Training Grant funds to a single eligible applicant. Successful applicants may contract for necessary goods and services with for-profit organizations under competitive procurement procedures as required by EPA grant regulations at 40 CFR Part 30 or 40 CFR Part 31, as applicable.

Q. What is the average number of persons trained through a training cycle?

*A. In past reporting, 20-24 appears to be the average number of persons trained during each cycle. This is usually due to the maximum number of trainees that can be accommodated in a classroom setting. This number also fluctuates depending on if the training program is located in an urban versus rural geographic setting where they may be a large number of persons seeking training or not. While EPA does not set requirements on the number of individuals to enter and complete training, **EPA encourages applicants to train the maximum number of persons possible.** Different grantees will also have varying number of persons entering training based on the intensity of the curriculum, the number of certifications to be earned, and the varying costs of delivering training, etc.*

Q: Does EPA require grantees/applicants to have a set training curriculum?

A: Yes. However, the only required course is OSHA 29 CFR 1910.120 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training. In addition, EPA encourages grantees to have multi-faceted curriculums and offer diversified training in order to assist graduates with obtaining sustainable, full-time employment in various environmental and brownfields redevelopment activities. This is important given the nature of contractual, short-

term, remediation work, seasonal hiring in the environmental and remediation fields, and for individuals who may be entering the workforce for the first time.

Q. Where can I find information on Environmental Job Training Programs?

A. For more information on brownfields environmental job training programs, please visit the Hazardous Materials and Research Training Institute's website at: <http://www.hmtri.org> or <http://brownfields-toolbox.org>

Q. What are the important deadlines?

December 1, 2009

*Applications must be received or postmarked by
11:59 p.m. EDT*

Q. What is EPA's anticipated schedule for making award decisions?

January/December, 2009

*Applicants who failed to meet "Threshold Criteria"
are notified*

February/March 2010

Announcement of Grant awards